

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE:** )  
                    )  
**CUMMINGS MANOOKIAN, PLLC,** )     **Case No. 3:19-bk-07235**  
    **Debtor.**        )     **Chapter 7**  
                    )     **Judge Walker**  
**JEANNE ANN BURTON, TRUSTEE,** )  
    **Plaintiff,**      )  
                    )  
**v.**                )     **Adv. Proc. No. 3:20-ap-90002**  
                    )  
**HAGH LAW, PLLC; AFSOON**      )  
**HAGH; MANOOKIAN, PLLC; and**    )  
**FIRST-CITIZENS BANK & TRUST**    )  
**COMPANY,**          )  
    **Defendants.**      )  
                    )

**JEANNE ANN BURTON, TRUSTEE'S RESPONSE TO MOTION TO  
RESCHEDULE STATUS CONFERENCE**

Jeanne Ann Burton, Chapter 7 bankruptcy trustee for the estate of Cummings Manookian, PLC (“Trustee”) does not oppose the request to continue the status conference in order to accommodate opposing counsel’s hearing schedule. However, the Trustee believes that a continuance to April 23, 2025, is simply too lengthy. The Sixth Circuit affirmed this Court’s denial of the Defendants’ two motions to recuse on December 20, 2024; the Trustee wishes to expedite the administration of this estate.

If the Court wishes to specially set this matter, undersigned counsel can make himself available March 10, 11, 12, 13, 20, 21, 24 or 28.

March 3, 2025

Respectfully submitted,

s/ Phillip G. Young, Jr.

Phillip G. Young, Jr. (21087)

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*Special Counsel for Jeanne Burton, Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of March, 2025, the foregoing *Response* was served electronically on all parties having entered a notice of appearance in this matter.

s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.